



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: Varn Wood Products, LLC
Facility Address: 107 N. Brantley Street
Hoboken, Georgia 31542 (Brantley County)
Mailing Address: 107 N. Brantley Street
Hoboken, Georgia 31542
Parent/Holding Company: Varn Wood Products, LLC
Facility AIRS Number: 04-13-025-00001

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

The conversion of existing direct fired wood drying kiln K02 from a batch to a continuous kiln.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. **2421-025-0001-V-04-0**. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This Amendment may be subject to revocation, suspension, modification, or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. **509812** dated **October 2, 2020**; any other applications upon which this Amendment or Permit No. **2421-025-0001-V-04-0** are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **7** pages.



Richard E. Dunn, Director
Environmental Protection Division

Table of Contents

PART 1.0	FACILITY DESCRIPTION.....	1
1.3	Process Description of Modification.....	1
PART 3.0	REQUIREMENTS FOR EMISSION UNITS.....	2
3.1	Additional Emission Units	2
3.2	Equipment Emission Caps and Operating Limits	3
PART 6.0	OTHER RECORD KEEPING AND REPORTING REQUIREMENTS	5
6.1	General Record Keeping and Reporting Requirements	5
6.2	Specific Record Keeping and Reporting Requirements.....	6

PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

Varn is proposing to convert the existing batch lumber drying kiln K02 to a continuous lumber drying kiln. The kiln will remain direct-fired, and the dry shavings combustion unit that currently provides heated air to the kiln will not be modified. Lumber throughput will increase from a baseline actual throughput of 39.1 MMbf/yr. to a maximum potential of 85 MMbf/yr. Emission increases for the project exceed the PSD Significant Emission Rate (SER) threshold for VOCs.

Title V Permit Amendment

Varn Wood Products, LLC

Permit No.: 2421-025-0001-V-04-2

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.1 Updated Emission Units

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
LUMBER MILL				
K01	Drying Kiln No. 1	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(g)2.	None	NA
K02	Drying Kiln No. 2	40 CFR 52.21 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1. 391-3-1-.02(2)(g)2.	None	NA
S01	Sawmill	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(ii)	None	NA
P01	Planer Mill	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	C02	Cyclone
H01	Hammer Mill	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	C01 C07	Cyclone Cyclone
H02	Wood Hog	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	C03	Cyclone
PELLET MILL				
PH1	Pre-Grind Hammermill	391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	None	NA
WB1	Wood Burner – 40 MMBtu/hr. Suspension Direct-Fired Furnace	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	C05	High- Efficiency Multicyclone
DD1	Triple-Pass rotary drum dryer with 15 ODT/hr. capacity	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	C05	High- Efficiency Multicyclone
HM2	Hammermill with 15 ODT/hr. capacity	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH1	Baghouse
PM1, PM2 and PM3	Pellet Mills rated at 5 ODT/hr. each	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	C06	High -Efficiency Cyclone and Wood Burner (100% recycle)
PC1	Pellet Cooler with 15 ODT/hr. capacity	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	C06	High -Efficiency Cyclone and Wood Burner (100% recycle)
VS	Vibrating Screen	391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	None	NA
PS	Pellet Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	NA
TLO	Truck Loadout	391-3-1-.02(2)(e) 391-3-1-.02(2)(n)	None	NA

* **Modified emission unit is in bold.**

3.2 Equipment Emission Caps and Operating Limits

Modified Condition

- 3.2.1 The Permittee shall construct and operate the continuous drying kiln (ID No. K02) in accordance with the application submitted. If the Permittee constructs or operates a source or modification not in accordance with the application submitted pursuant to that rule or with the terms of any approval to construct, the Permittee shall be subject to appropriate enforcement action.
[391-3-1-.02(7)(b)15. and 40 CFR 52.21(r)(1)]

New Conditions

- 3.2.7 Approval to construct the continuous drying kiln (ID No. K02) shall become invalid if construction is not commenced within 18 months after receipt of such approval, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Director may extend the 18-month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date. For purposes of this Permit, the definition of “commence” is given in 40 CFR 52.21(b)(9).
[391-3-1-.02(7)(b)15. and 40 CFR 52.21(r)(2)]
- 3.2.8 The Permittee shall not process more than 85 million board feet (MMbf) of lumber in the continuous drying kiln (ID No. K02), during any twelve consecutive months.
[40 CFR 52.21 and Georgia Air Toxic Guidelines]
- 3.2.9 Within 180 days of the initial startup of the continuous drying Kiln (ID No. K02), the Permittee shall develop and implement a Site-Specific Kiln Emissions Management Plan (KEMP); identifying general work practice standards to minimize emissions. The program shall be subject to review and modification by the Division. All operational and maintenance checks shall be made, and a record of the findings and corrective actions taken, shall be kept in electronic or manual maintenance logs. With future equipment changes or modifications, the site-specific KEMP may be modified.
[391-3-1-.02(7)(b)7. ; 40 CFR 52.21(j)(3); and 40 CFR 70.6(a)(3)(i)]
- 3.2.10 The Permittee shall operate the power vents on the continuous drying kiln (ID No. K02) at all times when K02 is in operation.
[Georgia Air Toxic Guidelines]

Equipment Federal Rule Standards

New Condition

- 3.3.1 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A – “General Provisions,” and Subpart DDDD – “National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products” for operation of the Continuous Drying Kilns (ID Nos. K01 and K02).
[40 CFR 63 Subpart A and Subpart DDDD]

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**Modified Condition

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

None required to be reported in accordance with Condition 6.1.4.

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

- i. Any rolling twelve consecutive month total of VOC emissions from the pellet manufacturing operation that is equal to or exceeds 249 tons as specified in Permit Condition 2.1.1.
- ii. Any rolling twelve consecutive month totals for a single HAP or total HAPs from the pellet manufacturing operation that is equal to or exceeds 10 tons or 25 tons respectively, per Condition 2.1.2.
- iii. Any twelve consecutive month period for which the total amount of lumber dried in the continuous drying kiln (ID No. K02), exceeds 85 million board feet.
- iv. Any twelve consecutive month period for which the total amount of wood products processed by the drying kiln with Source Code K01 exceeds 49.4 million board feet.
- v. Any twelve consecutive month period for which the total amount of wood chips processed by the Pellet Mill Drum Dryer, recorded in accordance with Conditions 6.2.2, exceeds 84,000 tons (ODT basis).

- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

- i. Any adverse condition discovered by a weekly inspection, as required by Condition 5.2.1.

- ii. Any instance in which daily pressure drop readings, required by Condition 5.2.2, are outside of the established range for two consecutive days.
- iii. Any two consecutive required daily determinations of visible emissions requiring action by Condition 5.2.6 from the same source.
- iv. Any two consecutive required daily determinations of visible emissions per Condition 5.2.7 that exceed 10 percent opacity from the same source.
- v. Specific identification of each period of excursion described in paragraphs i. through iv. of this condition. Include the magnitude, nature, and cause of any malfunction (if known), as well as the corrective action taken, or preventive measures adopted (if any).
- vi. Any three-hour average temperature at the exit of the Wood Burner (Source Code WB1), measured and recorded as required by Condition 5.2.4, below 1600 °F.
- vii. Any three-hour average temperature at the inlet of dryer DD1, measured and recorded as required by Condition 5.2.5, above 828 °F or the temperature established during the most recent performance test.
- viii. Any incidence that the work practice & preventative maintenance plan specified per Condition 3.2.9 is not followed.
- ix. Any time the power vents of the continuous drying kiln (ID No. K02) are not operated while K02 is in operation.

6.2 Specific Record Keeping and Reporting Requirements

New Conditions

6.2.10 The Permittee shall furnish the Division written notification as follows:
[40 CFR 70.6(a)(3)(i) and 391-3-1-.02(6)(b)1.]

- a. The actual date of initial startup of the continuous drying kiln (ID No. K02), within 15 days after such date.
- b. Certification that a final inspection has shown that construction has been completed in accordance with the application, plans, specifications, and supporting documents submitted in support of the Permit within 60 days after the initial startup.

Title V Permit Amendment

- 6.2.11 The Permittee shall maintain monthly records of the amount of the dried lumber processed through the continuous drying kiln (ID No. K02), necessary to confirm compliance with the production limit in Condition 3.2.8. The Permittee shall notify the Division in writing if the production through the continuous drying kiln (ID No. K02) exceeds 7.08 million board feet during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the production limit in Condition 3.2.8.
[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)(ii)(B)]
- 6.2.12 The Permittee shall, each month, calculate and record the twelve-month rolling total of the board feet of lumber dried in the continuous drying kiln (ID No. K02), using the monthly records required in Condition No. 6.2.11. A twelve-month rolling total shall be defined as the sum of the current month's total plus the totals for the previous eleven consecutive months.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]